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13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 Pamela Brown, Individually, and as
16 Special Administratrix of the Estate of
17 James Brown,

18 Plaintiff,

19 v.

20 United States of America,

21 Defendant.

22 Case No. 2:20-cv-01814-GMN-DJA

23 **Stipulation to Extend the United States'**
24 **Deadline to Answer**
(First Request)

25 Pursuant to Local Rule IA 6-1, Defendant United States of America requests a 21-
26 day extension of time to file an answer or otherwise respond to Plaintiff's Complaint.
27 (ECF No. 1). Based on the date of service of the summons and complaint on the United
28 States, the answer or other response is due by November 30, 2020. With the extension,
29 the new deadline to answer or otherwise respond would be December 21, 2020. This is
30 the United States' first request for extension.

31 This is a wrongful death claim brought under the Federal Tort Claims Act
32 ('FTCA'). Given the nature of this action, counsel for the United States must review the
33 decedent's medical records before responding to the allegations in the Complaint.
34 Counsel for the United States requests additional time to review the file because he is

1 preparing for an upcoming trial in the matter *Tucker v. United States*, case no. 2:18-02255-
2 VCF. The United States does not anticipate that more than the 21 days requested will be
3 necessary to file an answer or otherwise respond to the Complaint. Counsel for the
4 United States has discussed this matter with counsel for Plaintiff. The parties agree to the
5 proposed 21-day extension.

6 **WHEREFORE**, the United States respectfully requests that this stipulation be
7 granted and that the answer or other response be made due by **December 21, 2020**.

8 Respectfully submitted this 30th day of November 2020.
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10 LAIRD LAW, PLLC

11 /s/ Daniel O. Laird
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14 Attorney for Plaintiff

NICHOLAS A. TRUTANICH
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/s/ Brian W. Irvin
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17 Attorneys for the United States

18 IT IS SO ORDERED:
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DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE

DATED: December 1, 2020